

EXHIBIT 16

Affidavit of Caren Cowan

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BEFORE ME, the undersigned authority, personally appeared, CAREN COWAN, who upon being first duly sworn, states as follows:

1. I live at 3417 Avenida Charada NW, Albuquerque, New Mexico 87107.

2. I am the executive director of the New Mexico Cattle Growers' Association (NMCGA) and the registered agent of the organization. I have held this position for over 19 years. Our organization represents the ranching community in New Mexico as well as 19 other states. Some of our members have family ranches that stretch back as far as 14 generations. The typical NMCGA member is a fifth generation rancher. Our members understand that they are links in a chain stretching back into the past and on into the future.

3. For me, my own family and members of NMCGA, ranching automatically goes hand in glove with stewardship of the land. We preserve and protect our land not only because we depend on the land economically, but also because we love our land and way of life. We also seek to protect the land in order to ensure the wellbeing and opportunities of generations to come.

4. I was born in Douglas, Arizona. I was reared on a commercial cattle ranch near Tombstone, Arizona. My great-grandfather settled in Tombstone in

1881. He bought his first cow in 1884. My family and extended family have been ranching in Cochise County, Arizona since that time or before. Today, my sister and I still own a part of the ranch near Elfrida, Arizona and Gleeson, Arizona, which we have leased to other ranchers in the area. My nephew resides on the ranch, the fifth generation of our family to do so.

5. Border issues have long been of concern to my family and friends in Arizona. Border security and the safety of families living and working on the land is a high priority of the NMCGA.

6. For me, the borderlands have always been a special place. I experience spiritual renewal when I am out in these vast open spaces with no sounds other than wildlife and livestock, and not a person for miles around. I am able to clear my head and my heart and rejuvenate from the stress and oppression of urban life. Tragically, in Cochise County, Arizona, it is no longer safe in many places to find such solitude due to the uncertainty of when and where illegal aliens will attempt to cut through the country and head straight for Interstate 10. The same is true for much of the U.S.-Mexico border.

7. The stark reality is that it is no longer safe for my family and friends to even go to the barn to feed and care for animals without a weapon. It is not advisable to leave just one person at ranch headquarters alone due to the possibility

of illegal aliens coming in. Members of the NMCGA have had countless break-ins, losing personal belongings including vehicles, weapons, and livestock. Two members have had sheep or calves stolen only to find the animal carcasses in range of the house or working pens.

8. In the spring of 2010, a longtime friend, Rob Krentz, and his dog were murdered on his multi-generation family ranch. This was a deep personal blow to me as well as the rest of the ranching community in New Mexico and Arizona. I keep a close friendship with his widow, Sue, and son, Frank. Rob's murder is a wound that will never heal for any of us.

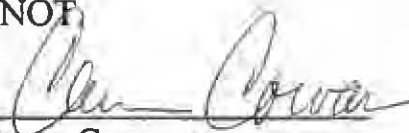
9. Indeed, my maternal grandmother's homestead house on the border has been ransacked by illegal aliens on more than once occasion. That house has been home to five generations of my family. Trash dumped around our house and pasture is evidence of the disregard of illegal aliens for the landscape. It is devastating and frightening to behold and has ruined my enjoyment of my family's land.

10. I now understand that our federal government, most specifically Department of Homeland Security (DHS), should have analyzed and considered these substantial and ongoing environmental impacts to the border region. It has adopted numerous major discretionary actions relating to the illegal entry of

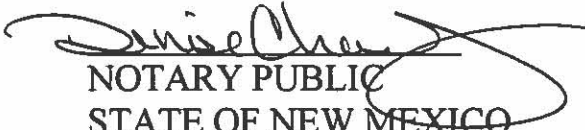
foreign nationals into the United States that have resulted in much of the environmental damage. But DHS never did any environmental analysis whatsoever before adopting numerous agency actions related to border security and immigration enforcement. This is a shocking disappointment. Not only is it disappointing, I now realize, it was against the law. The National Environmental Policy Act (NEPA) mandates that it do this environmental analysis. Perhaps if DHS had evaluated what was going on it might have made better decisions and allocated resources differently.

11. I do not understand why, but border enforcement activities only begin to take place 30 to 60 miles north of the border. Not only does this practice not provide safety for those living next to the border, but it shields the damage that is occurring in the no man's land along the border. This federal policy is mind-boggling to me since I, and my fellow citizens depend on the United States to comply with federal law and also protect the borders of this country. We all know that this has not happened and I feel injured by this failure.

FURTHER AFFIANT SAYETH NOT


Caren Cowan

Subscribed and sworn to before me on Sept. 30, 2016, by CAREN COWAN. She is personally known to me or has presented Caren E. Cowan - as identification.


NOTARY PUBLIC
STATE OF NEW MEXICO
MY COMMISSION EXPIRES

